

REMARKS

The present application as filed on June 20, 2003 with claims 1-43. Claims 1-43 remain pending. Claims 1, 22 and 43 have been amended. Claims 1, 22 and 43 are the independent claims.

In the outstanding Office Action dated May 3, 2006, the Examiner rejected claims 1-43 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,477,451 to Brown et al. (hereinafter "Brown").

With regard to the rejection of claims 1-43 under 35 U.S.C. §102(b) as being anticipated by Brown, Applicants assert that Brown fails to disclose the limitations of independent claims 1, 22 and 43, as amended. Claims 1, 22 and 43 have been amended to more clearly recite features of the model of class labels and substructures within strings of the training data set. Support for this amendment can be found on page 6, lines 13-14 of the Specification, as well as in FIG. 2.

Brown discloses a system for translating text from a first language into a second language, through scoring various possible translations and making the translation with the highest score available. The Examiner contends that the models used in Brown anticipate all elements of the independent claims.

Applicants assert that the models referred to in Brown disclose two different ways of scoring translations in order to determine which translation to make available. These models do not comprise multiple states capable of transitions based on a pre-defined probability. Thus, Brown fails to disclose constructing a model of class labels and substructures within strings of the at least one training data set, wherein the training data set has markers identifying labeled substructures and the model comprises a plurality of underlying states having transitions in accordance with predefined probabilities. Brown also fails to disclose the inserting and predicting, steps of the independent claims, in accordance with the model. Thus, Brown fails to disclose the elements of independent claims 1, 22 and 43.

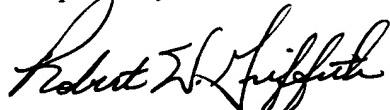
Dependent claims 2-21 and 23-42 are patentable at least by virtue of their dependency from independent claims 1 and 22, and also recite patentable subject matter in their own right. Accordingly, withdrawal of the rejection to claims 1-43 under 35 U.S.C. §102(b) is therefore respectfully requested.

Attorney Docket No. YOR920030004US1

With regard to the rejections of claims 5-21, the Examiner fails to provide support for the rejections. For example, to claim 15 refers to determining the number of states in the model using at least one training data set and the Examiner fails to provide any specific reasoning for the rejection of this claim. Instead only a general statement is provided, which fails to directly address the limitations of claim 15 and numerous other dependent claims to which the statement is applied. The Examiner provides a similar lack of support for the rejections of claims 23-42. The Examiner fails to provide any detailed support or to specific citations to the reference for these rejections.

In view of the above, Applicants believe that claims 1-43 are in condition for allowance and respectfully request withdrawal of the §102(b) rejection.

Respectfully submitted,



Robert W. Griffith
Attorney for Applicant(s)
Reg. No. 48,956
Ryan, Mason & Lewis, LLP
90 Forest Avenue
Locust Valley, NY 11560
(516) 759-4547

Date: August 3, 2006